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Attorneys for Defendant Technical Chemical Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANGELA UNDERWOOD, Personal
Representative of the Estate of TYLER
UNDERWOOD,

Plaintiffs,

v.

O'REILLY AUTO ENTERPRISES, LLC d/b/a
O'Reilly Auto Parts, Inc, ILLINOIS TOOL
WORKS INC., Individually and as Successor in
Interest to Pennzoil Quaker State Company
d/b/a Gumout, THE BLASTER
CORPORATION, CRC INDUSTRIES, INC.,
SAFETY-KLEEN SYSTEMS, INC.,
HIGHLAND STORES, INC. d/b/a BiRight
Markets, BI-RITE MARKETS, INC,
7-ELEVEN, INC., RICHARD A. HALEY,
AUTOZONE STORES, LLC, f/k/a Autozone
Stores, Inc., AMREP, INC., ADVANCE
STORES COMPANY, INCORPORATED,
Individually and as Successor in Interest to and
d/b/a CarQuest Auto Parts, ASHLAND, LLC,
Individually and as Successor in Interest to and
d/b/a Valvoline, CALUMET BRANDED
PRODUCTS, LLC f/k/a Calumet Packaging,
LLC, SUNNYSIDE CORPORATION, W.M.
BARR & COMPANY, INC., TECHNICAL
CHEMICAL COMPANY, RM MARKETS,
INC., CITGO PETROLEUM CORPORATION,
AND TOWER ENERGY,

Defendants.

Case No.: 2:21-cv-01766-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE REPLY
IN SUPPORT OF DEFENDANT
TECHNICAL CHEMICAL COMPANY'S
MOTION TO SET ASIDE CLERK'S
ENTRY OF DEFAULT (ECF No. 108)**

[FIRST REQUEST]

1 Pursuant to LR 6-1, the parties, through their respective undersigned counsel, do hereby move
2 for a order to stipulation and agree as follows:

3 1. On June 12, 2023, TCC filed its Motion to Set Aside Clerk's Entry of Default (ECF
4 No. 108) (the "Motion") (ECF No. 322).

5 2. Plaintiff filed her Answer to TCC's Motion to Set Aside Clerk's Entry of Default (ECF
6 No. 327) on June 26, 2023.

7 3. TCC's Reply is currently due July 3, 2023.

8 4. The current deadlines, pursuant to the Joint Stipulation for Limited Extension of
9 Certain Case Management Deadlines and proposed Order (Fourth Request) (ECF No. 304) are:
10 Discovery Cut-Off – September 6, 2023; Dispositive Motion Deadline: October 4, 2023 and Proposed
11 Pretrial Order due by November 3, 2023.

12 5. Plaintiff filed a Second Amended Complaint (ECF No. 302) on June, 1, 2023.

13 6. Due to the upcoming holiday, counsel for TCC requests a two week extension to allow
14 time to prepare and file its Reply.

15 7. Good cause exists for an extension due to the following reasons: (1) TCC's handling
16 defense counsel had a planned vacation and is celebrating his tenth wedding anniversary over the
17 holiday weekend; (2) TCC's handling defense counsel has several depositions and impending motion
18 deadlines in other matters that are concurrent with the instant Reply deadline; (3) TCC's handling
19 defense counsel's local Las Vegas office is suffering personnel shortages due to a new attorney that
20 previously accepted employment, provided a start date, and failed to meet that commitment.

21 8. Counsel for Plaintiff agreed to extend the deadline for TCC to file its Reply in support
22 of TTC's Motion (ECF No. 322) to and including Monday, July 17, 2023.

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9. TCC's Counsel has not previously obtained an extension in regard to this Motion.

IT IS SO STIPULATED.

Dated: June 29, 2023

LITCHFIELD CAVO LLP

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Dated: June 29, 2023

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Dated: June 29, 2023

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Dated: June 29, 2023

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Dated: June 29, 2023

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Dated: June 29, 2023

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1 Dated: June 29, 2023

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1 Dated: June 30, 2023

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Dated: June 29, 2023

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Dated: June 29, 2023

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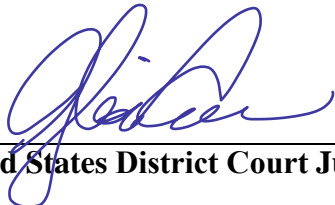
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ORDER

IT IS SO ORDERED that the deadline for TCC to file its Reply in support of TTC's Motion (ECF No. 322) is up to and including Monday, July 17, 2023.

Date: June 30, 2023.



United States District Court Judge